



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia Pennsylvania 19103 2029

NOV 19 2014

VIA UPS

Kevin Burkett
Environmental Manager
O'Sullivan Films
1944 Valley Avenue
Winchester VA 22601

Re Request for Information Pursuant to Section 3007(a) of the Resource
Conservation and Recovery Act, 42 U S C § 6927(a) Regarding Generation and
Management of Hazardous Waste by O Sullivan Films
EPA ID No VAD003062742
Reference No C15-001

Dear Mr Burkett

The U S Environmental Protection Agency, Region III (EPA) is requesting information to supplement the information obtained by EPA during the inspection of Galvco Maryland LLC located at 7110 Quad Avenue, Baltimore, Maryland (the "Facility") on March 18, 2014. A copy of the inspection report is enclosed. EPA is requesting this information pursuant to the authority granted to it under Section 3007(a) of the Resource Conservation and Recovery Act (RCRA), 42 U S C § 6927(a) which provides in relevant part that ' any person who generates stores treats transports disposes of or otherwise handles or has handled hazardous wastes shall upon request of any officer employee or representative of the Environmental Protection Agency duly designated by the Administrator, furnish information relating to such wastes ' EPA hereby requires that you furnish to EPA **within fifteen (15) calendar days of receipt of this letter** the information requested below including all documents responsive to such request.

For each and every request, if you have any reason to believe that there may be a person(s) who may be able to provide a more detailed or complete response to such request or may be able to provide additional responsive documents, then as a part of your response to such request, identify each such person and the additional information or documents which such person may be able to provide. Furthermore for each and every response if information or documents responsive to such request are not in your possession custody or control then as part of your response to such request, identify each person from whom such information or documents may be obtained.

Please provide a separate narrative response to each question. Precede each answer with the number of the question or letter of the subpart of the question to which it corresponds. A request for documents shall be construed as a request for any and all documents maintained by you or in your custody, control, or possession or in the possession, custody or control of any of your employees or agents, relating to the matters described below. For each copy of a document produced in response to this request, indicate on such copy, or in some other reasonable manner the number of the request to which it responds, the current location and custodian of the original, the date such original was prepared, the person(s) who prepared the original and the date the document became effective at the Facility. *Copies of all documents must be legible.*


As used herein the term 'document' means writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phonograph records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer print outs, or other data compilations from which information can be obtained or translated.

All other terms used in this request for information that are defined in RCRA, 42 U.S.C. §§ 6901 *et seq.* or 40 C.F.R. Parts 260, 266, 268, and 273 shall have the meanings set forth therein.

Requested Information

1. Regarding the 6 unlabeled drums mentioned on page 11 of the inspection report and seen in photo 32
 - a. Identify the contents and volume of material in each container at the time of the inspection.
 - b. Provide the date on which these containers first began to accumulate at the Facility. If an exact date cannot be determined, please provide an estimated time period of accumulation (month/year).
 - c. State yes or no, was a "waste determination" and LDR determination made for any of the materials in these containers at the time of the inspection?
 - d. Have any of these containers been shipped off-site since the EPA inspection, please submit copies of all packing slips, shipping invoices, bills of lading, manifests (hazardous and non-hazardous) and LDR notices/certifications that accompanied the off-site shipment of each of these containers.

- 2 Regarding the blue drum mentioned on page 11 of the inspection report and seen in photo 34
 - a Identify the contents and volume of material in each container at the time of the inspection
 - b State whether or not a 'waste determination' and 'LDR determination' made for the material in this container at the time of the inspection?
 - c If determined to be a waste, would any of the material be a "hazardous waste"? If so please state the specific EPA Hazardous Waste Code(s) associated with each such material
- 3 Regarding Paint Line #4 the inspector observed a total of 6 containers storing waste solvent, as seen in photos 36 and 41
 - a Explain in detail what part of the process this waste solvent is generated
 - b Explain the purpose of the hoses coming from each of the containers
 - c Explain in detail, how this waste solvent is recovered for reuse in the process
 - d State whether any hazardous waste determination made for this material was based on the generator's knowledge of the process that generated the waste or upon analytic results. If a determination was made on the basis of process knowledge describe in detail the scientific rationale for such a determination. If the determination was based on analytical results describe the sampling procedures and provide copies of any and all such results
- 4 Regarding Paint Line #3, the inspector observed a total of 3 containers storing waste solvent as seen in photos 47
 - a Explain in detail what part of the process this waste solvent is generated
 - b Explain the purpose of the hoses coming from each of the containers
 - c Explain in detail how this waste solvent is recovered for reuse in the process
 - d State whether any hazardous waste determination made for this material was based on the generator's knowledge of the process that generated the waste, or upon analytic results. If a determination was made on the basis of process knowledge describe in detail the scientific rationale for such a determination. If the determination was based on analytical results, describe the sampling procedures and provide copies of any and all such results

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- 5 Regarding the facility's determination the waste blast grit from cleaning the chrome rollers is non hazardous, see inspection report page 13
- a If a determination was made on the basis of process knowledge, describe in detail the scientific rationale for such a determination
 - b If the determination was based on analytical results describe the sampling procedures and provide copies of any and all such results
- 6 Regarding the 55 gallon container in the printer or press room of the Spread Coater area, see page 14 of inspection report
- a Is this container considered a SAA or a 90 day storage?
- 7 Regarding the Solvent recovery process system, see inspection report page 14
- a Explain the process or processes the solvent is used for once it leaves Tank #21
 - b Provide a detailed schematic of the solvent waste handling systems associated with each waste stream including sources of solvent waste, equipment piping transfer mechanisms and all tanks and containers involved in temporary or final collection/management of the waste stream
 - c A detailed description of all equipment included in each of the solvent waste handling systems including all pumps compressors pressure relief devices sampling connection systems open-ended valves or lines, valves flanges or other connectors closed-vent systems and control devices as these terms may be defined in 40 C F R § 264 1031
 - d State whether or not the Facility had conducted an analysis to determine applicability of the Subpart BB regulations to this equipment as described in 40 C F R § 265 1063(d) and 265 13(b) at any time before the day of inspection
 - e Has Tank #14 been brought back into service and if so what is the date?

The provisions of Section 3008 of RCRA 42 U S C § 6928, authorize EPA to pursue penalties for failure to comply with or respond adequately to an information request under Section 3007(a) of RCRA In addition, providing false fictitious, or fraudulent statements or representation may subject you to criminal penalties under 18 U S C § 1001 The information you provide may be used by EPA in administrative, civil or criminal proceedings

Your response must include the following signed and dated certification

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete As to the identified portions of this response for which I cannot

personally verify their accuracy I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information the information submitted is to the best of my knowledge and belief, true, accurate and complete I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations

Signature _____

Name _____

Title _____

You are entitled to assert a claim of business confidentiality covering any part or all of the information, in a manner described in 40 C F R § 2.203(b) Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C F R Part 2, Subpart B Unless a claim of business confidentiality is asserted at the time the requested information is submitted EPA may make this information available to the public without further notice to you

This request for information is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U S C §§ 3501-3520

Please send your response to

Stephen Forostiak (3LC70)
U S Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103 2029

If you have any questions concerning this matter please contact Mr Forostiak at (215) 814
2136

Sincerely

A handwritten signature in cursive script, appearing to read "Carol Amend".

Carol Amend Associate Director
Land and Chemicals Division
Office of Land Enforcement

cc Stephen Forostiak (3LC70)